

IN THE UNITED STATES DISTRICT COURT  
 FOR THE SOUTHERN DISTRICT OF TEXAS  
 MCALLEN DIVISION

VICTORIA C. PEREZ

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v.

CIVIL ACTION NO. 7:15-CV-00073

DONNA INDEPENDENT SCHOOL  
 DISTRICT

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**PLAINTIFF, VICTORIA C. PEREZ's RULE 26 DISCLOSURES**

COMES NOW, VICTORIA C. PEREZ, by counsel, and file this Rule 26 Initial Disclosures as required by Fed. R. Civ. P. 26(a)(1) as follows:

A. Name, address and telephone number of each individual likely to have knowledge of discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of the information.

**RESPONSE:**

NAME	ADDRESS/PHONE NO.	KNOWLEDGE
Castillo, Nancy L.	Donna High School ¼ Mi. E. Wood Ave. Donna, TX 78537 956/464-1700	Principal of Donna High School who has knowledge of Plaintiff's allegations against the District
Contreras, Bobby	300 W. Hall Acres, Suite F Pharr, TX 78577 956/784-3540	Justice of the Peace Precinct 2, Place 1
Cordova, Carlo A.	1206 Susan Dr. Edinburg, TX 78539 956/867-0973	Former employee of Donna ISD who has knowledge of the incident(s) made the basis of this lawsuit
Employees and or Representatives of Donna Independent School District	116 N. 10 <sup>th</sup> Street Donna, TX 78537 956/464-1600	Defendant
Employees and or Representatives of Donna ISD Police Department	956/464-1735	Investigated the incident made the basis of this lawsuit

NAME	ADDRESS/PHONE NO.	KNOWLEDGE
Garza, Rodolfo Jr.	Donna ISD Police 904 Hester Avenue Donna, TX 78537 956/464-1735	Investigating Officer Donna ISD Police
McCandless, Joshua	Donna ISD Police 904 Hester Avenue Donna, TX 78537 956/464-1735	Investigating Officer Donna ISD Police
Perez, Victoria C.	409 Casiano St. Donna, TX 78537 956/998-2230	Plaintiff
Reyna, Jesus	116 N. 10 <sup>th</sup> Street Donna, TX 78537 956/464-1600	Superintendent of Schools for Donna ISD
Scogin, Debbie	116 N. 10 <sup>th</sup> Street Donna, TX 78537 956/464-1600	Asst. Superintendent for Human Resources of Donna ISD who may have knowledge of Plaintiff's allegations against the District
Tamez, Alicia	409 Casiano St. Donna, TX 78537 956/998-2230	Plaintiff's grandmother
Valdez, Mari	116 N. 10 <sup>th</sup> Street Donna, TX 78537 956/464-1600	Testing Director of Donna ISD who has knowledge of Plaintiff's allegations against the District

B. A copy of, or a description by category and location of, all documents, data compilations, and tangible things in the possession, custody, or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment;

**RESPONSE:**

NO.	DOCUMENT/DESCRIPTION	LOCATION
1.	Municipal Court Complaint	Document(s) in possession of Plaintiffs' counsel, Ricardo A. Garcia, GARCIA, OCHOA & MASK, L.L.P., 820 S. Main, McAllen, TX 78501

Plaintiff will supplement as discovery continues.

C. A computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered.

**RESPONSE:**

Plaintiff will supplement.

D. For inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.

**RESPONSE:**

None in Plaintiff's possession.

Respectfully submitted,

**GARCIA, OCHOA & MASK, L.L.P.**

By: /s/ Ricardo A. Garcia  
RICARDO A. GARCIA  
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LINO H. OCHOA  
State Bar No. 00797168  
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Telephone No.: 956/630-2882  
Telecopier No.: 956/630-5393

**ATTORNEYS FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

I hereby certify that on this 29<sup>th</sup> day of May, 2015, a true and correct copy of the foregoing was delivered on counsel of record for Defendant, Donna Independent School District, via email to Defendant's lead counsel, Edward Garza, at the following email address: [eddie@esparzagarza.com](mailto:eddie@esparzagarza.com). In addition, counsel has been served with a copy of this pleading through the Court's EM/ECF electronic filing system.

/s/ Ricardo A. Garcia  
RICARDO GARCIA